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May 18, 1998

RECEIVED

MAY 27 1998

Ms. Magalie Roman Salas
Secretary
FEDERAL COMMUNICATIONS COMMISSION
Room 222
1919 M Street, N.W.
Washington, D.C. 20554

RE: Petition for Rule Making
Pauls Valley, Oklahoma
Wright & Wright, Inc.

Dear Ms. Salas:

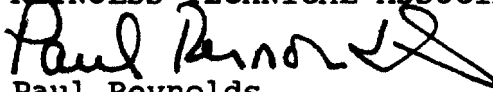
Enclosed please find the original and four duplicates of a petition for rule making that we wish to file for our client, Wright and Wright, Inc. The petition is certified by the company's vice-president, Roy Floyd.

This allotment was proposed at Pauls Valley in a previous rule making, however, all expressions of interest were dismissed or withdrawn. Therefore, the instant PRM is to be treated as a new petition and completely apart from MM Docket 97-84.

A copy is labeled "Receipt Stamped Copy" is attached to an addressed envelope. Please have someone receipt this copy and return to the petitioner for its files.

Thank you for your assistance in getting this petition filed.

Sincerely,
REYNOLDS TECHNICAL ASSOCIATES


Paul Reynolds

No. of Copies rec'd 024
List A B C D E

MMB

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Before the

FEDERAL COMMUNICATIONS COMMISSION

Washington, D.C. 20554

MM 27 1984

In The Matter of)

Amendment of Section 73.202(b),)
Table of Allotments,)
FM Broadcast Stations)
(Pauls Valley, Oklahoma))

MM Docket _____

RM _____

To:

Chief, Allocations Branch
Policy and Rules Division
Mass Media Bureau

PETITION FOR RULE MAKING

Wright & Wright, Inc ("WRIGHT"), hereby petitions the Commission to institute a Notice of Proposed Rule Making (NPRM) for the allocation of channel 283A to Pauls Valley, Oklahoma, as that Community's second FM broadcast service. WRIGHT gives the required verifications and also certifies that if the Commission allocates the channel it, or an entity in which it participates, will file an application for construction permit.

CHANNEL 283A AT PAULS VALLEY QUALIFICATIONS

As shown by the attached channel study, channel 283A, when allocated to Pauls Valley, appears to have no short spacing to any known licensed facilities, proposed minor changes or proposed rule makings.

The allotment of channel 283A at Pauls Valley was proposed as a substitute channel in MM Docket 97-84,

however, all expressions of interest were withdrawn. Presently channel 283A appears in the database as a proposed allotment at Pauls Valley. If the Commission chooses to allocate channel 283A to Pauls Valley in MM Docket 97-84, Wright certifies that all of the representations made in the instant petition should be considered by the Commission. Mainly, that it is interested in the allotment of channel 283A at Pauls Valley, and if the channel is allotted, it will apply for a construction permit to own and operate the new FM broadcast facility. All other certifications represented in the instant petition should be applied if the Commission allots channel 283A to Pauls Valley in MM Docket 97-84. However, if the Commission considers this document untimely filed in MM Docket 97-84, Wright respectfully request that it be considered as a new petition for rule making. The instant Wright petition should not be construed, in any manner, as an attempt on the part of Wright to late file comments in MM Docket 97-84, or to delay its implementation.

If the same reference coordinates proposed in MM Docket 97-84 are used for the instant petition, it appears that the nearest short spacing concerns are as follows: KMGL.L(FM), (channel 281C) Oklahoma City, Oklahoma, at 346.1°(Degrees) True; KYXI.L(FM) (channel 284C), Burkburnett, Texas, at 245.3°(Degrees) True, KMYZ.L(FM), Pryor, Oklahoma, (channel 283C1) at 44.9°(Degrees) True, KWSH.L(FM), Wewoka, Oklahoma, (channel 284A) at 56.9°(Degrees) True, and KBLP.L &

KBLP.C(FM), (channel 286A), Lindsay, Oklahoma, at 303.9°(Degrees) True. The intersecting of these minimum distance separation contours create the location area for a fully spaced antenna site for channel 283A at Pauls Valley. See Exhibit A.

The map shown in Exhibit B depict that the fully spaced site chosen for the instant rule making would cover 100% of the proposed city of license with a actual 70 dBu F(50,50) contour using the proposed allocation site as reference. A 16.2 KM reference contour was used. The technical parameters were an ERP of 6 KW and antenna HAAT of 100 meters (full class A).

The second map shows the window available for the allocation of channel 283A to Pauls Valley. This shows that WRIGHT's proposed coordinates do not short-space any existing stations, construction permits, applications, or allocations. See Exhibit C.

In order to alleviate potential FAA problems, WRIGHT could possibly use an existing structure in excess of 350 feet AGL at a fully spaced reference site under Section 73.215. If the Commission allocates channel 283A to Pauls Valley as that community's second local aural service, antenna sites in the immediate area of the WRIGHT reference coordinates will be available without FAA obstruction concerns.

PAULS' VALLEY, OKLAHOMA

Pauls Valley is located in Garvin County, Oklahoma. It has local banking, a functioning school system, a public library, in addition to police and municipal service systems which give it the required indicia required by the Commission to be a community of license. According to the United States Census Bureau, Pauls Valley had a population of 6,150 persons on January 1, 1990. The community is recognized as Census Designated Area by the US Census Bureau. Information from the Oklahoma Secretary of State depicts that it has a functioning city government and has been an incorporated city for several years.

PETITION SUMMARIZED

The petition for the allocation of channel 283A at Pauls Valley can be SUMMARIZED as follows:

| <u>COMMUNITY</u> | <u>PRESENT</u> | <u>PROPOSED</u> |
|------------------|----------------|-----------------|
| Pauls Valley | 249C3 | 249C3, 283A |

No substitutions of channels in other markets or interruption of service are necessary for this allocation. Since there are no channel deletions or substitutions necessary for the allocation of channel 283A at Pauls Valley, it can be allotted and applications for a construction permit filed immediately.

EXPRESSION OF INTEREST

WRIGHT hereby certifies that it is interested in the allocation of channel 283A at Pauls Valley and if the channel is allocated it, or an organization in which it

participates, will timely file an application for construction permit. It further states that it, or an entity in which it is a participant, will construct and daily operate this station, if it is the successful applicant.

PETITIONER'S PREFERENCE

WRIGHT is aware that talk in the "trade" lately has hinted that the Commission may institute a procedure commonly known as "petitioner's preference." This practice would, in essence, give a petitioner a preference when an application window was opened for an allocation. If this rule is implemented before the Commission takes action on the instant petition, it will respectfully request a petitioner's preference.

CONCLUSION

WRIGHT is petitioning the Commission to institute a Notice of Proposed Rule Making leading to the allocation of channel 283A at Pauls' Valley, Oklahoma, as that community's second local FM service. This channel is available for allocation immediately, as it requires no deletions and/or substitutions in other communities. However, the allocation will require a site restriction of 8.25 kilometers at 0° (due north from the community of license). WRIGHT has certified that it, or an entity in which it participates, will apply for the license at Pauls Valley if the channel is allocated.

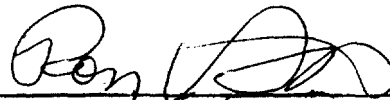
NOTE: The instant document was prepared by Paul Reynolds of Reynolds Technical Associates and should not be associated with other PRMs using similar formats or forms. For technical questions please refer to;

Paul Reynolds
REYNOLDS TECHNICAL ASSOCIATES
301 Cedar Street Suite 4
Greenville, AL 36037
(334) 382-3239

CERTIFICATION

I, Roy Floyd, Vice-President of Wright & Wright, Inc., which is the petitioner for the allotment of channel 283A at Paul's Valley, Oklahoma, do hereby verify that the statements contained in this Petition for Rule Making are true and correct to the best of my knowledge and belief. I represent that this Petition is not filed for the purpose of impeding, obstructing or delaying determination on any other application or petition with which it may be in conflict.

Respectfully Submitted,
WRIGHT & WRIGHT, INC.



By: Roy Floyd
Vice-President

This 13th Day of May, 1998

Roy Floyd, Vice President
WRIGHT & WRIGHT, INC.
P.O. Box 248
Bonham, Texas 75418

ENGINEERING STATEMENT

In Support of an

PETITION FOR A

RULE MAKING

Channel 283A, Pauls Valley, Oklahoma
WRIGHT & WRIGHT, INC.

ALLOCATION STUDY

[DEPICTING THAT CHANNEL 283A CAN BE ALLOTTED TO PAULS VALLEY]
(USING MM DOCKET 97-84 PROPOSED SITE AS REFERENCE)

| | | | | | | | |
|---------------------------------------|-------|---------------|------------------------|------------------------|--------|-------|-------------|
| 34 43 06 N. | | | | Class A | | | Search Date |
| 97 14 15 W. | | | | Current rules spacings | | | 05-12-98 |
| | | | Channel 283 -104.5 MHz | | | | |
| Call | Ch# | City | State | Bear' | Dist' | R'qrd | Margin |
| Community of Pauls Valley | | | OK | 57.2 | 1.42 | | |
| Reference Coordinates: | | | | | | | |
| North Latitude: 34-43-31 | | | | | | | |
| West Longitude: 97-13-28 | | | | | | | |
| AD283 | 283A | Pauls Valley | OK | 0.0 | 0.00 | 115.0 | -115.00 * |
| Of No Concern | | | | | | | |
| Allotment Proposed in MM Docket 97-84 | | | | | | | |
| KMGL | 281C | Oklahoma City | OK | 346.1 | 95.00 | 95.0 | 0.00 * |
| KYYI | 284C | Burkburnett | TX | 245.3 | 166.09 | 165.0 | 1.09 * |
| KMYZFM | 283C1 | Pryor | OK | 44.9 | 203.66 | 200.0 | 3.66 * |
| KWSHFM | 284A | Wewoka | OK | 56.9 | 75.93 | 72.0 | 3.93 * |
| KBLP | 286A | Lindsay | OK | 303.9 | 36.17 | 31.0 | 5.17 * |
| KBLP.C | 286A | Lindsay | OK | 303.9 | 36.17 | 31.0 | 5.17 * |
| KKDAFM | 283C | Dallas | TX | 174.0 | 237.43 | 226.0 | 11.43 |
| KKDAFM | 283C | Dallas | TX | 174.1 | 237.52 | 226.0 | 11.52 |
| KYYI.C | 284C1 | Burkburnett | TX | 245.3 | 166.09 | 133.0 | 33.09 |

EXHIBIT A

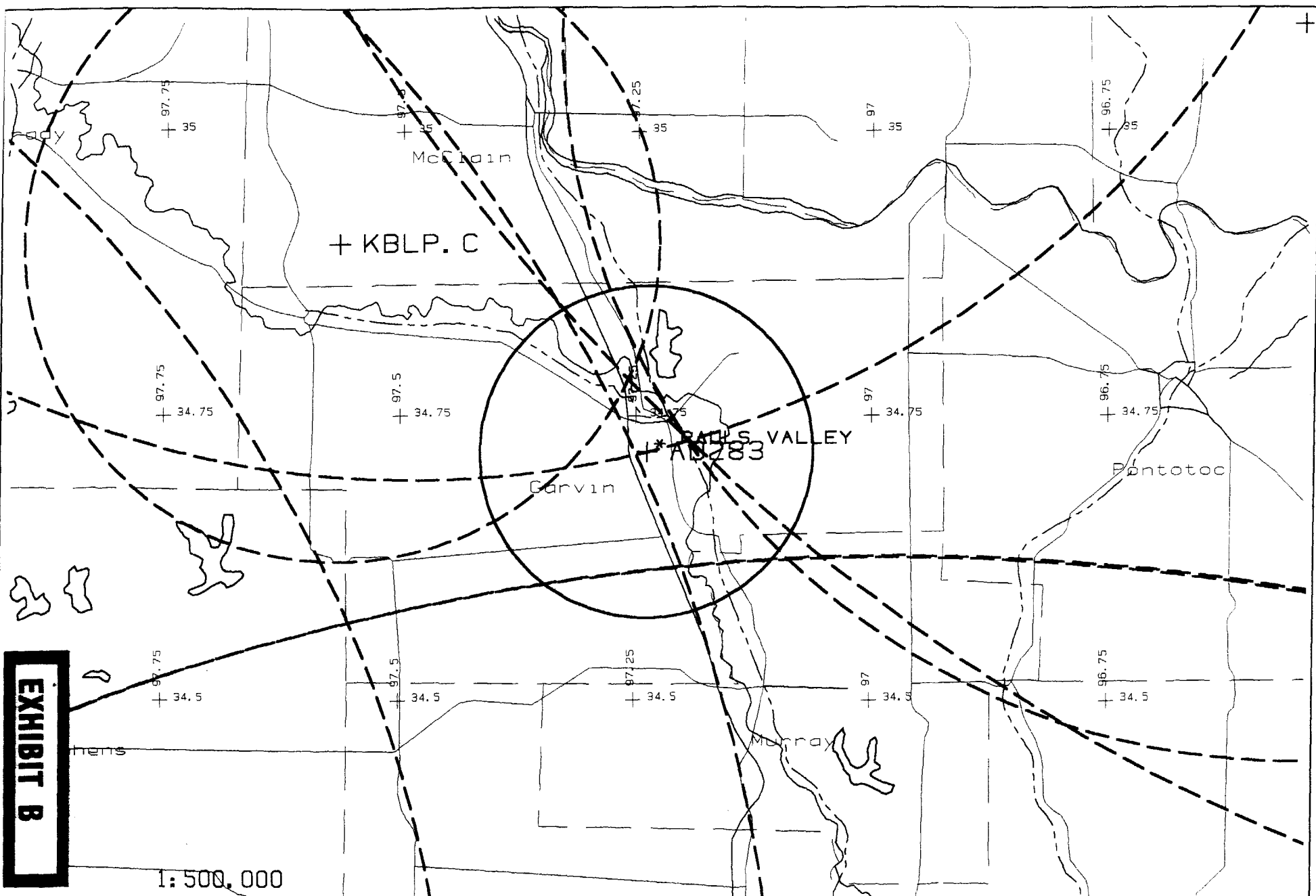
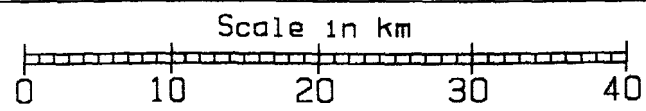


EXHIBIT B

1:500,000

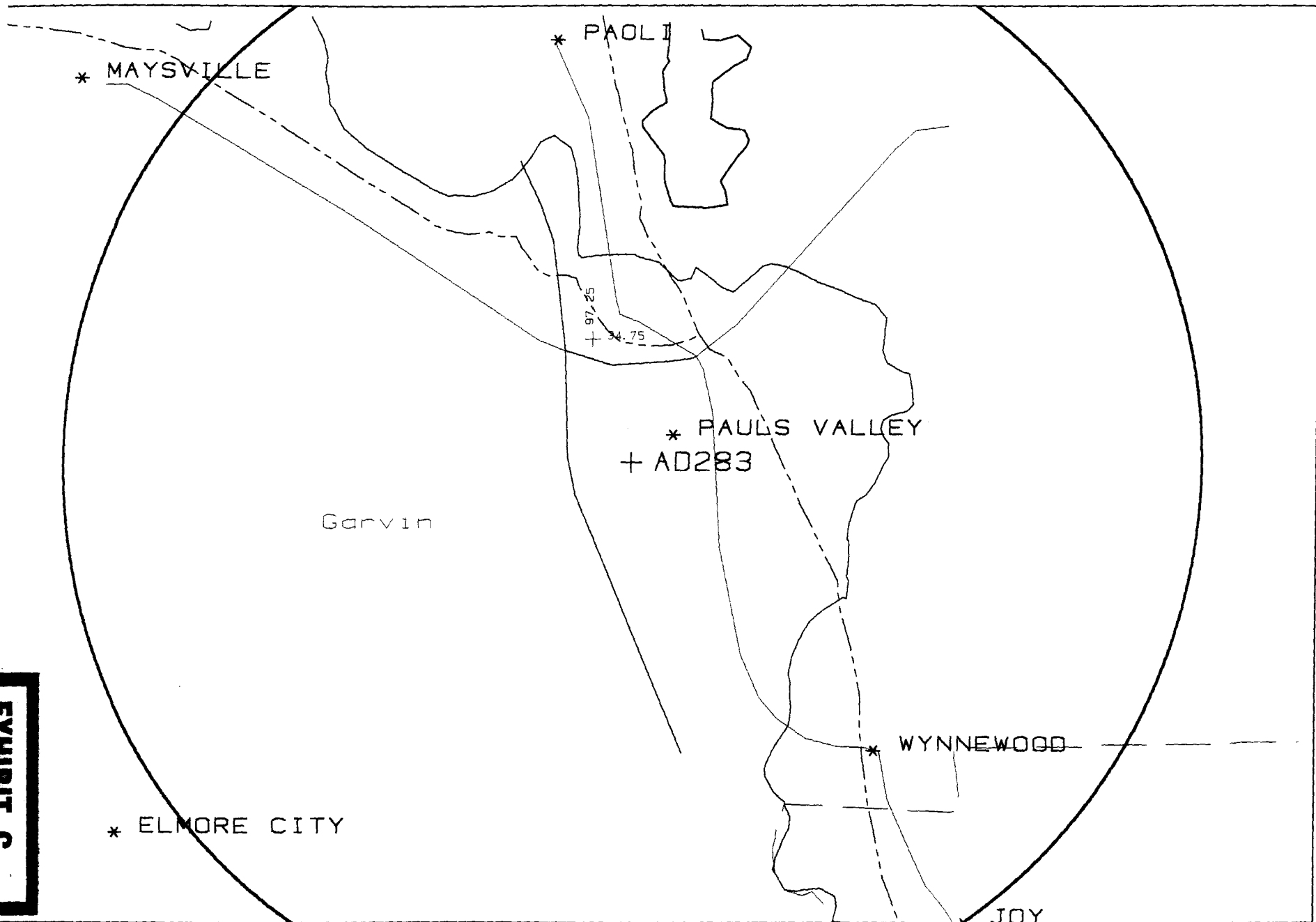


N. Lat. 34 43 06

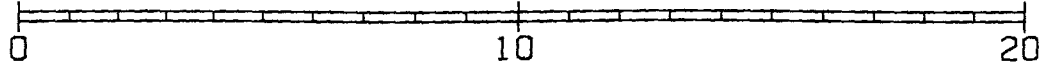
W. Lng. 97 14 15

AD 283A LOCATION
REYNOLDS TECHNICAL

EXHIBIT C



Scale in km



N. Lat. 34 43 06

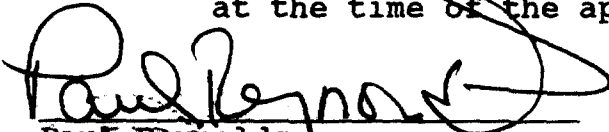
W. Lng. 97 14 15

ENGINEERING CERTIFICATION

STATE OF ALABAMA)
)
BUTLER COUNTY)

Paul Reynolds declares the following:

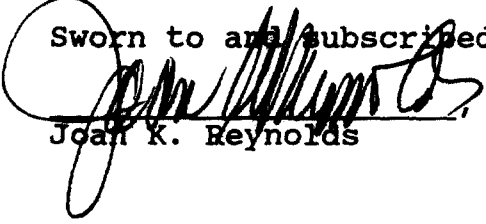
- * That he has completed undergraduate studies in the field of communications at the University of Southern Mississippi.
- * That he has completed course requirements for a Masters Degree in communications at the University of Alabama.
- * That he has completed basic electronics at DeVry Technical Institute.
- * That he has been operating as an independent communications consultant since 1980.
- * That he is familiar with the Commission's Rules and Regulations.
- * That the engineering for the instant Wright & Wright, Inc. Petition for Rule Making seeking the allotment of Channel 283A at Pauls Valley, Oklahoma, was prepared by him or under his direct supervision.
- * That all information presented is believed to be true and correct and in full compliance of the technical standards contained in the Commission's Rules and Regulations in affect at the time of the applicant's filing date.


Paul Reynolds

REYNOLDS TECHNICAL ASSOCIATES
301 Cedar Street Suite 4
Greenville, AL 36037

(334) 382-3239

Sworn to and subscribed before, this 18th day of May, 1998.


Joan K. Reynolds, My commission expires 7-15-2000